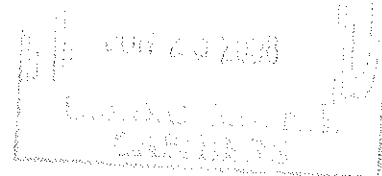


LATHROP & GAGE L.C.
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08 CIV 5695



Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X
MADELINE WEINRIB,

Plaintiff,

-against-

WILLIAMS-SONOMA, INC., d/b/a
Pottery Barn and d/b/a West Elm,
POTTERY BARN, INC., and
WEST ELM, INC.,

Defendants.
-----X

**COMPLAINT
AND JURY DEMAND**

ECF CASE

Plaintiff, Madeline Weinrib, by her undersigned attorneys, Lathrop & Gage L.C., as and
for her Complaint alleges as follows:

JURISDICTION AND VENUE

1. This is a civil action for copyright infringement arising under the Copyright Act of the United States, as amended, 17 U.S.C. § 101 et seq., over which this Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a). Venue properly lies in this District under 28 U.S.C. §§ 1391(b) and (c) and 1400(a).

PARTIES

2. Plaintiff, Madeline Weinrib, is an individual residing at 35 Wooster Street, New York, New York 10013 ("Plaintiff").

3. Plaintiff is the owner of certain copyrighted works registered with the United States Copyright Office including, without limitation, U.S. Visual Arts Copyright Registration Number VA 1-355-210 for the carpet (fabric/textile) design entitled "BROOKE in Blue" and U.S. Visual Arts Copyright Registration Number VA 1-626-901 for the carpet (fabric/textile) design entitled "BROOKE in Orange" (collectively referred to herein as the "BROOKE Carpet Design").

4. Upon information and belief, defendant Williams-Sonoma, Inc. ("WSI") is a company organized and existing under the laws of California with offices at 3250 Van Ness Avenue, San Francisco, California 94109-1012.

5. Upon information and belief, defendant Pottery Barn, Inc. ("PB") is a company organized and existing under the laws of California with offices at 3250 Van Ness Avenue, San Francisco, California 94109-1012, and does business under the trade name "Pottery Barn".

6. Upon information and belief, PB is a division of WSI.

7. Upon information and belief, WSI owns and controls the activities of PB (collectively referred to hereinafter as "WSI-PB").

8. Upon information and belief, defendant West Elm, Inc. ("WE") is a company organized and existing under the laws of California with offices at 3250 Van Ness Avenue, San Francisco, California 94109-1012, and does business under the trade name "West Elm".

9. Upon information and belief, WE is a division of WSI.

10. Upon information and belief, WSI owns and controls the activities of WE (collectively referred to hereinafter as "WSI-WE").

11. Upon information and belief, WSI, PB, WSI-PB, WE and WSI-WE do business in this state and in this judicial district through their respective websites and retail stores located within this judicial district (WSI, PB, WE, WSI-PB and WSI-WE are hereinafter collectively referred to as "Defendants").

FACTS COMMON TO ALL CLAIMS FOR RELIEF

Plaintiff's Activities

12. Plaintiff is a well-known designer and creator of many innovative and contemporary textile designs, each of which are original works of art, which express new and fashionable ideas in art and design. Plaintiff's textile designs embodied in, inter alia, floor coverings and other home furnishings are sold to retailers and consumers around the world, in the United States and in this District.

13. Plaintiff's textile designs are displayed, in-store and on the Internet, and sold at her own studio located within the famous ABC Carpet and Home store on Broadway in New York, New York.

14. Plaintiff is continuously creating new and contemporary designs for home furnishings, accessories and clothing, including, without limitation, carpets, garden chairs, carpetbags, clutches, sarongs and jackets.

15. In 2004 Plaintiff created and remains the owner of the BROOKE Carpet Design, an original work of authorship, embodying copyrightable subject matter. Plaintiff's copyrighted design has been and is reproduced on different varieties of carpets, including metallics, chenille

and Tibetan wool. Since its creation, the BROOKE Carpet Design has become one of Plaintiff's signature carpet designs.

16. The BROOKE Carpet Design entitled "BROOKE in Blue" is copyrightable subject matter under the laws of the United States and said work was first published in the United States on December 28, 2004. Plaintiff is the owner of U.S. Visual Arts Copyright Registration Number VA 1-335-210 for the work "BROOKE in Blue." A true copy of the registration certificate for "BROOKE in Blue" and an image of the underlying work are annexed hereto as composite Exhibit A.

17. Plaintiff is also the owner of U.S. Visual Arts Copyright Registration Number VA 1-626-901 for another BROOKE Carpet Design entitled "BROOKE in Orange" which was first published in the United States on June 13, 2005. A copy of the registration certificate for "BROOKE in Orange" and an image of the underlying work are annexed hereto as composite Exhibit B.

18. Plaintiff is currently and at all relevant times has been the sole owner of the entire right, title and interest in and to the copyrights in the BROOKE Carpet Design. Plaintiff has published, reproduced and distributed the BROOKE Carpet Design in conformity with the provisions of the Copyright Act of the United States.

19. Plaintiff operates a website on the Internet located at www.madelineweinrib.com which serves to advertise, promote and sell her floor coverings, home furnishings, accessories and clothing items bearing her designs, including carpets featuring the BROOKE Carpet Design. Annexed hereto as composite Exhibit C is a copy of relevant excerpts from Plaintiff's website located at www.madelineweinrib.com.

20. Plaintiff's BROOKE Carpet Design has enjoyed widespread publicity and acclaim through, *inter alia*, being featured in numerous interior design magazines and publications, including *Vogue*, *Art News*, *The New York Times*, *World of Interiors*, *Architectural Digest*, *House & Garden*, *Shop Etc.*, *Domino Magazine*, *In Style*, *Interior Design*, *Met Home* and *Elle Décor*.

21. Since December 2004 Plaintiff has enjoyed widespread sales of carpets featuring the BROOKE Carpet Design through retail stores located in the United States and in this District. Such sales reflect the popularity of Plaintiff's BROOKE Carpet Design.

22. Plaintiff's copyrighted BROOKE Carpet Design is currently available in retail stores located throughout the United States, as well as available for viewing on the Internet. The copyrighted BROOKE Carpet Design is sold to consumers in this District, and throughout the United States.

Defendants' Unlawful Acts

23. Upon information and belief, Defendants sell home furnishings and decorative accessories to consumers throughout the United States, and in this District.

24. Upon information and belief, WSI-PB operate a direct-to-consumer business in the United States and sell home furnishings and decorative accessories through direct mail catalogs, retail stores operating under the name and mark Pottery Barn, and e-commerce websites on the Internet, including WSI-PB's website located at www.potterybarn.com.

25. Upon information and belief, WSI-WE operate a direct-to-consumer business in the United States and sell home furnishings and decorative accessories through direct mail catalogs, retail stores operating under the name and mark West Elm, and e-commerce websites on the Internet, including WSI-WE's website located at www.westelm.com.

26. Upon information and belief, WSI-PB are offering for sale, distributing and selling rugs under the name "Moorish Tile Rug" through, inter alia, their "April 2008" catalogue and also through their website located at www.potterybarn.com. Images of WSI-PB's "Moorish Tile Rug" can be found on the front cover, on page 89, and on the back cover of WSI-PB's April 2008 catalogue. A true copy of a relevant excerpt from the WSI-PB website depicting WSI-PB's "Moorish Tile Rug" is attached hereto as Exhibit D.

27. Upon information and belief, WSI-WE are offering for sale, distributing and selling rugs under the name "Taksim Tile Rug" through, inter alia, their catalogue and through their website located at www.westelm.com. A true copy of a relevant excerpt from the WSI-WE website depicting WSI-WE's "Taksim Tile Rug" is attached hereto as Exhibit E.

28. Upon information and belief, prior to the creation and publication of WSI-PB's "Moorish Tile Rug" and WSI-WE's "Taksim Tile Rug", Defendants had access to Plaintiff's copyrighted BROOKE Carpet Design.

29. Upon information and belief, WSI-PB knowingly and willfully copied Plaintiff's BROOKE Carpet Design, specifically the arrangement of copyrighted portions thereof, in creating WSI-PB's "Moorish Tile Rug".

30. Upon information and belief, WSI-WE knowingly and willfully copied Plaintiff's BROOKE Carpet Design, specifically the arrangement of copyrighted portions thereof, in creating WSI-WE's "Taksim Tile Rug".

31. The designs embodied in WSI-PB's "Moorish Tile Rug" manufactured, promoted and sold by Defendants are substantially similar, if not strikingly similar, to Plaintiff's BROOKE Carpet Design.

32. The designs embodied in WSI-WE's "Taksim Tile Rug" manufactured, promoted and sold by Defendants are substantially similar, if not strikingly similar, to Plaintiff's BROOKE Carpet Design.

33. Defendants, by their acts described above, have taken advantage of the knowledge and skill of Plaintiff, and of the good will developed by Plaintiff, and have capitalized upon the commercial market created by Plaintiff for its design.

34. By Defendants' unauthorized use of designs substantially the same as Plaintiff's design, Defendants have been able to pass off and sell their respective carpets, at a cheaper price, bearing unauthorized reproductions of Plaintiff's copyrighted design, and portions thereof, as a substitute for carpets bearing Plaintiff's copyrighted design.

COUNT I
CLAIM FOR COPYRIGHT INFRINGEMENT AGAINST DEFENDANTS WSI-PB

35. Plaintiff realleges paragraphs 1 through 34 above and incorporates them by reference as if fully set forth herein.

36. Plaintiff is the owner of U.S. Visual Arts Copyright Registration Number VA 1-355-210 for the "BROOKE in Blue" carpet design first published on December 28, 2004; and U.S. Visual Arts Copyright Registration Number VA 1-626-901 for the "BROOKE in Orange" carpet design first published on June 13, 2005.

37. Upon information and belief, as a result of the extensive display, promotion, and sale of carpets bearing Plaintiff's BROOKE Carpet Design, WSI-PB had access to the copyrighted BROOKE Carpet Design prior to WSI-PB's creation and publication of the "Moorish Tile Rug."

38. The design of WSI-PB's "Moorish Tile Rug" is substantially similar to the Plaintiff's copyrighted BROOKE Carpet Design.

39. Upon information and belief, the defendants WSI-PB, without the permission or authorization of Plaintiff, began and have continued to manufacture, import, distribute, display, sell, promote and/or have contributed to or actively participated in, and continue to contribute to or actively participate in, the manufacture, importation, sale, distribution, display and promotion of the "Moorish Tile Rug" which reproduces and/or incorporates original elements of Plaintiff's copyrighted BROOKE Carpet Design, with actual or constructive knowledge that the "Moorish Tile Rug" infringes upon Plaintiff's BROOKE Carpet Design.

40. The natural, probable and foreseeable result of the wrongful conduct of WSI-PB has been and continues to deprive Plaintiff of the rights and benefits granted to her under the Copyright Act of the United States, including the exclusive right to use, reproduce and exploit the copyrighted BROOKE Carpet Design and to create derivative works based on those designs, and continues to deprive Plaintiff of the goodwill in the copyrighted BROOKE Carpet Design, and continues to injure Plaintiff's relations with the trade and with present and prospective customers.

41. By its actions as alleged above, WSI-PB, with actual or constructive knowledge, have infringed and violated Plaintiff's exclusive rights in her copyright in violation of the Copyright Act of the United States, 17 U.S.C. § 501, et seq., by manufacturing, displaying, promoting, distributing, selling, importing and/or contributing to and actively participating in the manufacture, importation, distribution, promotion, display and sale of the "Moorish Tile Rug" which contain designs that are virtually indistinguishable from the BROOKE Carpet Design, all without Plaintiff's authorization or consent.

42. Upon information and belief, WSI-PB's infringement of Plaintiff's copyright in the BROOKE Carpet Design is willful and deliberate and defendants WSI-PB have profited at the expense of Plaintiff.

43. The unauthorized and infringing use by WSI-PB of Plaintiff's BROOKE Carpet Design, unless enjoined, will cause harm and injury to Plaintiff in that the sale of copies of Plaintiff's original design will severely diminish the value of Plaintiff's BROOKE Carpet Design by diluting the market and destroying the distinctiveness of the design and its identity as being Plaintiff's exclusive property.

44. The conduct of defendants WSI-PB have caused and will continue to cause irreparable injury to Plaintiff unless enjoined by this Court.

45. Plaintiff has no adequate remedy at law.

COUNT II
CLAIM FOR COPYRIGHT INFRINGEMENT AGAINST DEFENDANTS WSI-WE

46. Plaintiff realleges paragraphs 1 through 45 above and incorporates them by reference as if fully set forth herein.

47. Upon information and belief, as a result of the extensive promotion, display and sale of carpets bearing Plaintiff's BROOKE Carpet Design, WSI-WE had access to the copyrighted BROOKE Carpet Design prior to WSI-WE's creation and publication of the "Taksim Tile Rug".

48. The design of WSI-WE's "Taksim Tile Rug" is substantially similar to the Plaintiff's copyrighted BROOKE Carpet Design.

49. Upon information and belief, the defendants WSI-WE, without the permission or authorization of Plaintiff, began and have continued to manufacture, import, distribute, promote,

display, sell, and/or have contributed to or actively participated in, and continue to contribute to or actively participate in, the manufacture, importation, sale, distribution, display and promotion of the "Taksim Tile Rug" which reproduces and/or incorporates original elements of Plaintiff's copyrighted BROOKE Carpet Design with actual or constructive knowledge that the "Taksim Tile Rug" infringes upon Plaintiff's BROOKE Carpet Design.

50. The natural, probable and foreseeable result of the wrongful conduct of WSI-WE has been and continues to deprive Plaintiff of the rights and benefits granted to her under the Copyright Act of the United States, including the exclusive right to use, reproduce and exploit the copyrighted BROOKE Carpet Design and to create derivative works based on those designs, and continues to deprive Plaintiff of the goodwill in the copyrighted BROOKE Carpet Design, and continues to injure Plaintiff's relations with the trade and with present and prospective customers.

51. By its actions as alleged above, WSI-WE, with actual or constructive knowledge, have infringed and violated Plaintiff's exclusive rights in her copyright in violation of the Copyright Act of the United States, 17 U.S.C. § 501, et seq., by manufacturing, displaying, promoting, distributing, selling, importing and/or contributing to and actively participating in the manufacture, importation, distribution, promotion, display and sale of the "Taksim Tile Rug" which contain designs that are virtually indistinguishable from the BROOKE Carpet Design, all without Plaintiff's authorization or consent.

52. Upon information and belief, WSI-WE's infringement of Plaintiff's copyright in the BROOKE Carpet Design is willful and deliberate and defendants WSI-WE have profited at the expense of Plaintiff.

53. The unauthorized and infringing use by WSI-WE of Plaintiff's BROOKE Carpet Design, unless enjoined, will cause harm and injury to Plaintiff in that the sale of copies of Plaintiff's original design will severely diminish the value of Plaintiff's BROOKE Carpet Design by diluting the market and destroying the distinctiveness of the design and its identity as being Plaintiff's exclusive property.

54. The conduct of defendants WSI-WE has caused and will continue to cause irreparable injury to Plaintiff unless enjoined by this Court.

55. Plaintiff has no adequate remedy at law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment as follows:

1. Preliminarily and permanently enjoining Defendants, their employees, agents, officers, directors, attorneys, successors, affiliates, subsidiaries and assigns, and all those in active concert and participation with Defendants from:

(a) directly or indirectly infringing Plaintiff's copyrights in the BROOKE Carpet Design; and

(b) continuing to market, display, offer, sell, distribute, license, transfer, advertise, promote, reproduce, develop, manufacture, import, or contribute to or actively participate in the marketing, display, offering, sale, distribution of, licensing, transferring, advertising, promotion, reproduction, development, manufacture or importation of any goods that bear, contain or incorporate any unauthorized copy or reproduction of the copyrighted BROOKE Carpet Design or any designs substantially similar thereto or derived therefrom; and

(c) aiding, assisting or abetting any other party in doing any act prohibited by sub-paragraphs (a) and (b).

2. Requiring Defendants to abandon with prejudice any and all copyrights, including applications to register the copyright, in any work consisting of, or containing, the copyrighted BROOKE Carpet Design.

3. Directing that Defendants recall all infringing goods and copies within their possession and from each agent, distributor, wholesaler, retail store and vendor which manufactures, distributes, displays or promotes, offers for sale or sells any goods that infringe upon Plaintiff's BROOKE Carpet Design.

4. Directing that Defendants deliver up for impoundment during the pendency of this action, and then for destruction or other reasonable disposition as part of a final judgment, all infringing products and goods, all advertisements for such, all articles by means of which such infringing goods and copies may be reproduced and other related materials in their possession, or under their control, incorporating or bearing simulations, variations or colorable imitations of Plaintiff's BROOKE Carpet Design.

5. (a) Directing such other relief as the Court may deem appropriate to prevent the trade and public from deriving the erroneous impression that the "Moorish Tile Rug" or any product or service manufactured, sold, distributed, licensed or otherwise offered, circulated or promoted by the Defendants is authorized by Plaintiff or related in any way to Plaintiff's copyrighted BROOKE Carpet Design.

(b) Directing such other relief as the Court may deem appropriate to prevent the trade and public from deriving the erroneous impression that the "Taksim Tile Rug" or any product or service manufactured, sold, distributed, licensed or otherwise offered, circulated or

promoted by the Defendants is authorized by Plaintiff or related in any way to Plaintiff's copyrighted BROOKE Carpet Design.

6. Directing that Defendants file with the Court and serve upon Plaintiff's counsel within thirty (30) days after entry of such judgment, a report in writing under oath, setting forth in detail the manner and form in which the Defendants have complied with the foregoing injunctions.

7. Recognizing Defendants' acts of infringement have been willful, intentional, and purposeful, in disregard of and indifferent to the rights of Plaintiff.

8. Awarding Plaintiff as a direct and proximate result of Defendants' infringement of Plaintiff's copyrights and exclusive rights under copyright, maximum statutory damages pursuant to 17 U.S.C. § 504(c). Alternatively, at Plaintiff's election, pursuant to 17 U.S.C. § 504(b), Plaintiff shall be entitled to her actual damages, plus all profits, gains, and advantages obtained or derived by the Defendants from their acts of copyright infringement.

9. Awarding Plaintiff her costs, including reasonable attorneys' fees, and disbursements incurred in this action, pursuant to 17 U.S.C. § 505.

10. Awarding Plaintiff interest, including pre-judgment interest, on the foregoing sums.

11. Awarding Plaintiff such other, further and different relief as the equities of this case may require and as this Court may deem just and proper under the circumstances.

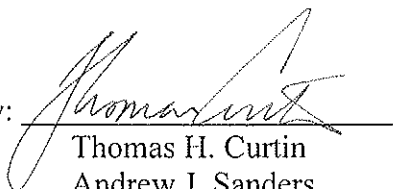
JURY DEMAND

Plaintiff hereby demands a trial by jury pursuant to Fed. R. Civ. P. 38.

Dated: New York, New York
May 24, 2006

Respectfully submitted,

LATHROP & GAGE L.C.

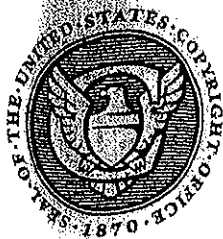
By: 
Thomas H. Curtin
Andrew J. Sanders

230 Park Avenue, Suite 1847
New York, New York 10169
(212) 850-6220 (tel)
(212) 850-6221 (fax)

Attorneys for Plaintiff
Madeline Weinrib

EXHIBIT A

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America



REGISTRATION NUMBER

VA 1-855-210



Effective Date of Registration

2-13-06

Application Received
FEB 13 2006

Deposit Received

FEB 13 2006

Fee Received

TYPE OR PRINT IN BLACK INK. DO NOT WRITE ABOVE THIS LINE.

Title of This Work:

1

BROOKE IN BLUE

Alternative title or title of larger work in which this work was published:

Name and Address of Author and Owner of the Copyright:

2

Madeline Beth Weinrib, US Citizen
35 Wooster Street
New York, NY 10013

Nationality or domicile:
Phone, fax, and email:

Phone (212) 473-3000 x780
Email

Fax ()

Year of Creation:

3

2004

If work has been published,
Date and Nation of Publication:

4

a. Date December 28 2004 (Month, day, and year all required)
Month Day Year

b. Nation

Type of Authorship
in This Work:

Check all that this author created.

5

☐ 3-Dimensional sculpture

☒ 2-Dimensional artwork

☐ Technical drawing

☐ Photograph

☐ Jewelry design

☐ Map

☐ Text

Signature:

6

Registration cannot be completed without a signature.

I certify that the statements made by me in this application are correct to the best of my knowledge.* Check one:

☐ Author ☒ Authorized agent

X _____ *Gianfranco G. Mitrione*

Name and Address of Person to Contact for Rights and Permissions:
Phone, fax, and email:

7

☐ Check here if same as #2 above.

Gianfranco G. Mitrione Lathrop & Gage L.C., 230 Park Ave., Ste 1847, New York, NY 10169

Phone (212) 850-6230

Fax (212) 850-6221

Email gmitrione@lathropgage.com

OPTIONAL

8

Certificate will be mailed in window envelope to this address:

Name ▼

Gianfranco G. Mitrione Lathrop & Gage L.C.

Number/Street/Apt ▼

230 Park Avenue, Suite 1847

City/State/ZIP ▼

New York, New York 10169

Complete this space only if you currently hold a Deposit Account in the Copyright Office.

9

Deposit Account # _____

Name _____

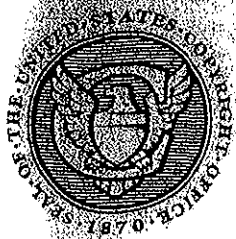
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Page 1 of 1 pages



EXHIBIT B

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Registration Number:

VA 1-626-901

Effective date of
registration:

February 14, 2008

Title

Title of Work: BROOKE in Orange

Nature of Work: Fabric Design / Textile Design

Completion/Publication

Year of Completion: 2004

Date of 1st Publication: June 13, 2005

Nation of 1st Publication: United States

Author

Author: Madeline Weinrib

Author Created: 2-Dimensional artwork

Work made for hire: No

Citizen of: United States

Year Born: 1956

Anonymous: No

Pseudonymous: No

Copyright claimant

Copyright Claimant: Madeline Weinrib

c/o Madeline Weinrib Atelier, 888 Broadway, 6th Floor, New York, NY
10013

Limitation of copyright claim

Previously registered: No

Certification

Name: Andrew Jonas Sanders, Esq., Attorney-in-fact for Madeline
Weinrib

Date: February 13, 2008

**Receipt**

Copyright Office
Library of Congress
101 Independence Avenue SE
Washington, DC 20559-6000



No. 1-PY8S9

Date: 2/14/2008 11:16:17 AM

Received

Form(s): 1 VA
Deposit Count: 1
Piece Count: 2
Type of Deposit: TEXTILE ART
Other Enclosures: SP HNDG REQ
Title: BROOKE IN ORANGE
of Additional Titles:
Priority:
Received By: LPAS
Of Documents:

☐ Search Report
☐ Search
☐ Retrieval
☐ Correspondence
☐ Inspection
☐ Photocopies
☐ Additional Certificate
☐ Certification
☐ Secure Test Exam

Other:

Received From: JENNISON & SHULTZ

Phone:

2001 JEFFERSON DAVIS HWY

ARLINGTON, VA 22202

United States

Representing:

Phone:

Corresponding Id:

| Fees | Method of Payment | Amount |
|--|-----------------------|----------|
| No Fee: <input type="checkbox"/> | Check: | 1 @ 730. |
| Fee to be Determined: <input type="checkbox"/> | Money Order: | |
| Base Fee: \$45.00 | Deposit Account: | |
| Special Handling Fee: \$685.00 | Deposit Account Name: | |
| Secure Test Exam Fee: \$ | | |
| Total Due: \$730.00 | | |

Total Payment: \$730.00**Special Handling**

Delivery Method:

Contact:

Organization:

Notes

Receipt of material is merely a preliminary step in the registration and/or recordation process. It does not imply that any final determination has been made in the case, or that the material is acceptable for registration.

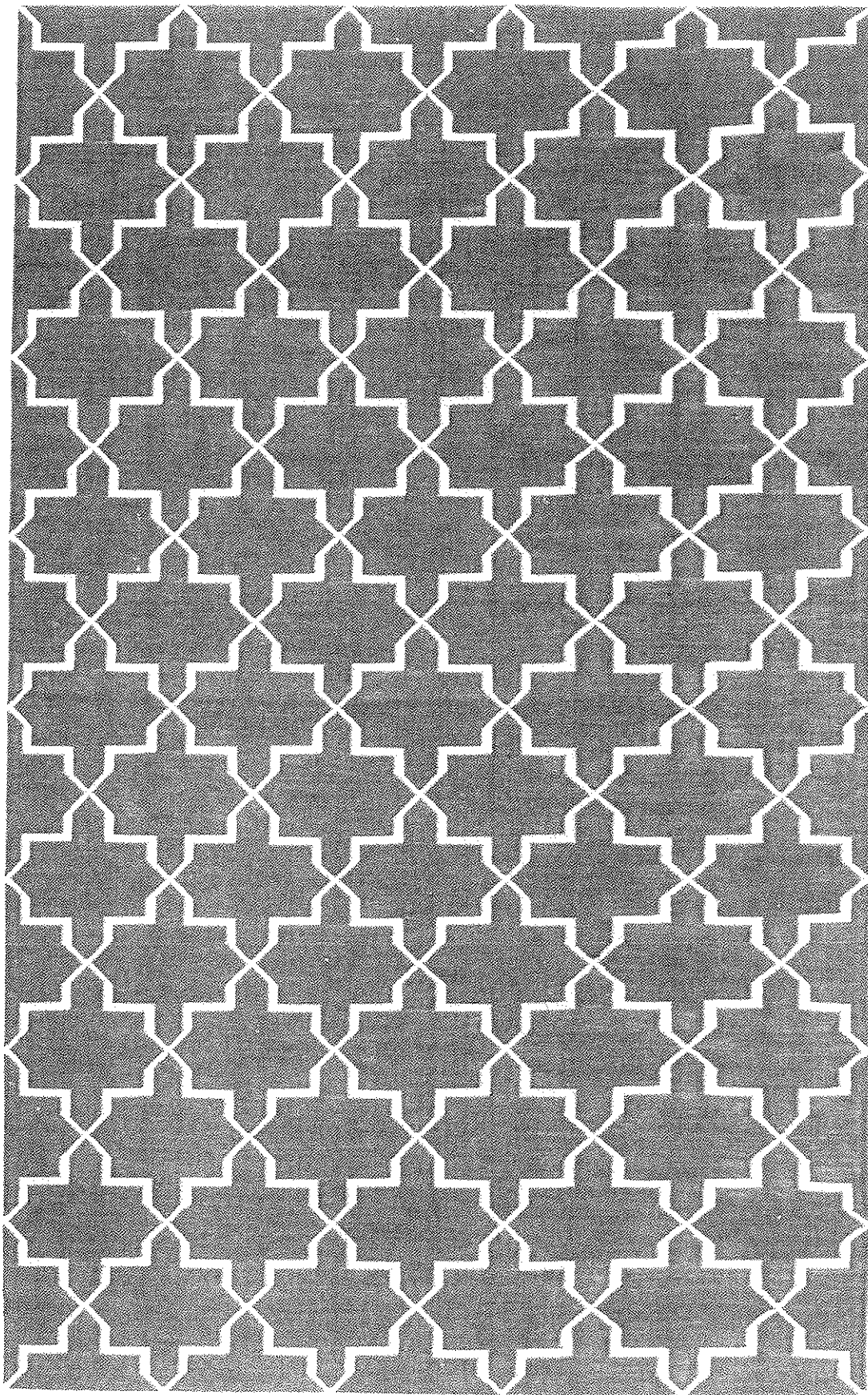


EXHIBIT C

CARPETS

15' x 11' 1/2'

12' x 9' 1/2'

CLIMBERS & RAMBLERS

VIEWER

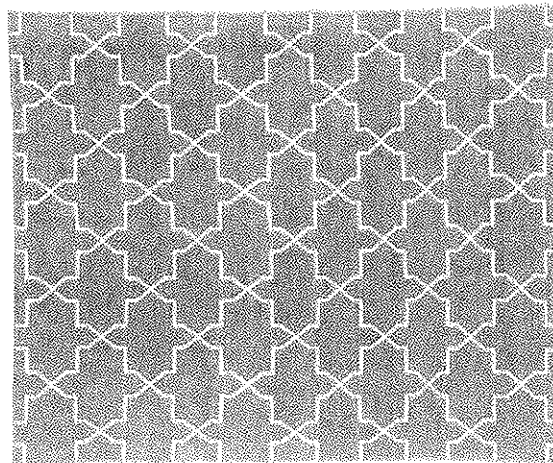
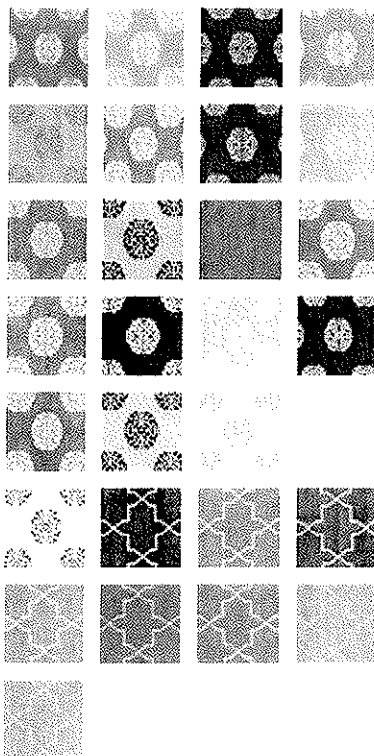
GLASS

METALLICS

CLAYMOS

COTTON PLATWEAVES 11' x 14'

11' x 14' 1/2'



Brooke Dusty Blue Chenille

3'6\" x 5'6\" 5' x 9' 8' x 10' 9' x 12' 10' x 14' 2'6\" x 9'

← BACK TO MAIN MENU

VIEWER

VIEW

VIEW

CARPIS

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doi:10.1017/S0007122612000117

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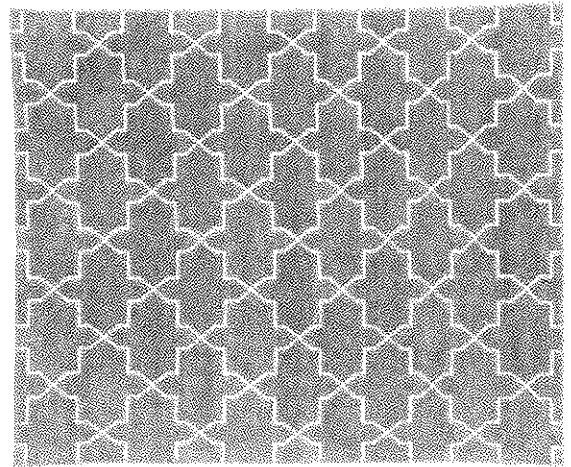
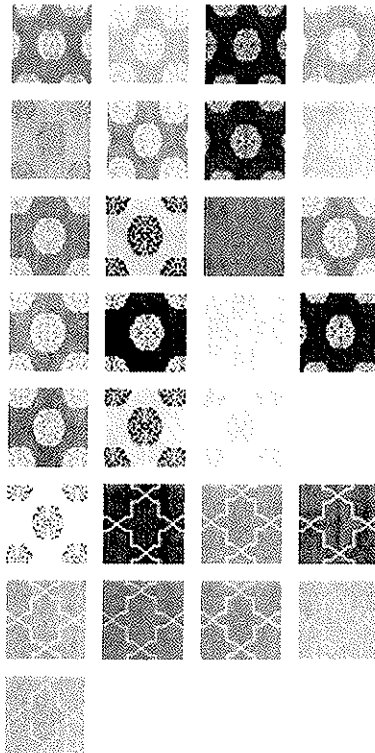
6110

121. 122. 123.

Abstract

COTTON FIBERSTAYS 1 2 3

$\frac{d}{dt} \left(\frac{\partial L}{\partial \dot{x}} \right) = \frac{\partial L}{\partial x}$



Brooke Tangerine Chenille

3'6" x 5'5" 6' x 9' 8' x 10' 9' x 12' 10' x 14' 2'6" x 9'

4. RESEARCH 10. DATE 11. NAME

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CARPETS

ISRAELI 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

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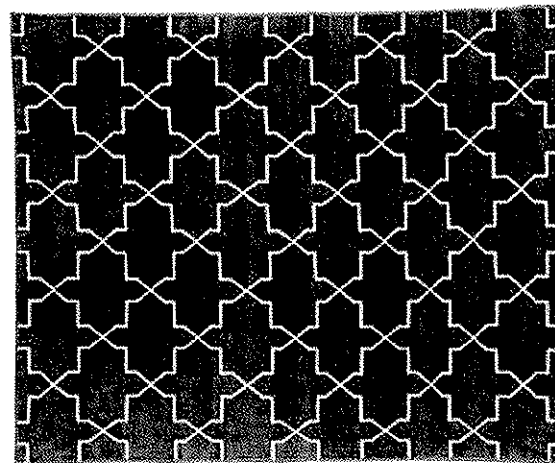
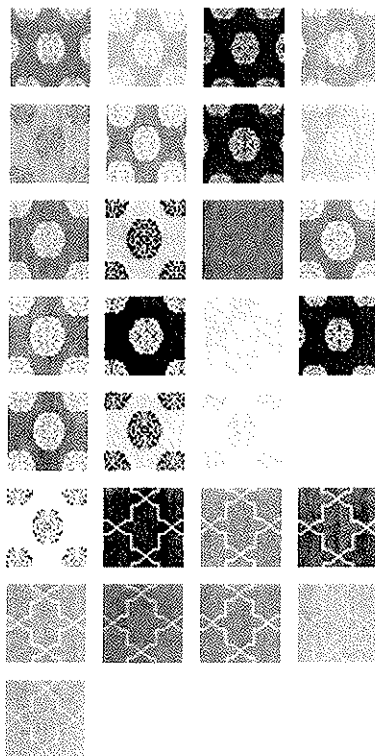
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Brooke Charcoal Chenille

3'6" x 5'6" 5' x 9' 8' x 10' 9' x 12' 10' x 14' 2'6" x 9'

4 BACK TO MAIN MENU

4 BACK TO MAIN MENU

4 BACK TO MAIN MENU

4 BACK TO MAIN MENU

4 BACK TO MAIN MENU

CARPETS

15 CARPETS

AFRICAN STRIPS

CLIMBERS & PARADES

VELVETS

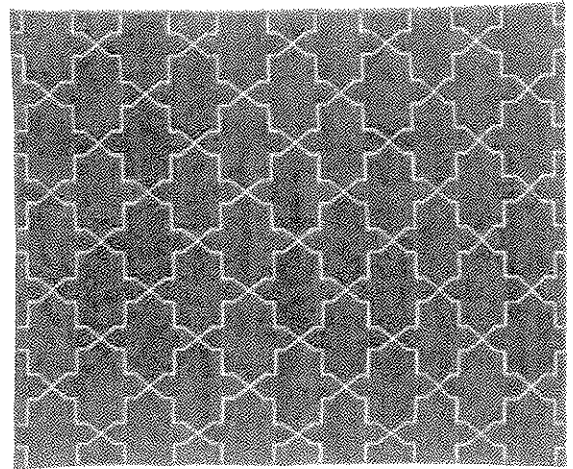
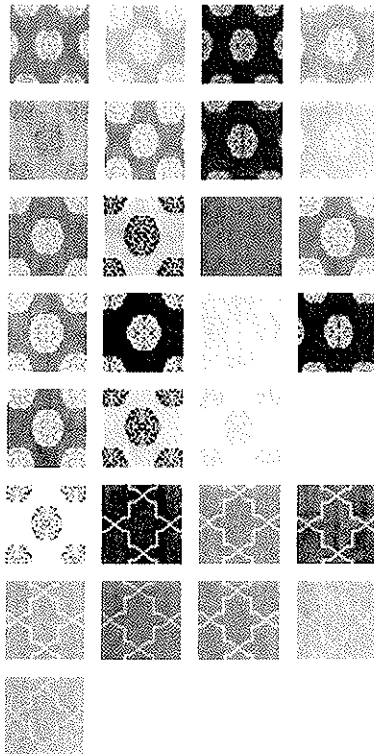
WILDS

RETAILERS

GENIES

COTTON PLATWEAVES 1 2 3

OTHERS 1 2 3



Brooke Hot Pink Chenille

3'6" x 5'6" 5' x 9' 8' x 10' 9' x 12' 10' x 14' 2'6" x 9'

4 BACK TO MAIN MENU

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20

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CARPETS

ISRAELI 1-2

NEILAN STRIPES

CHIMBING & RAMBLING

VELVETIN

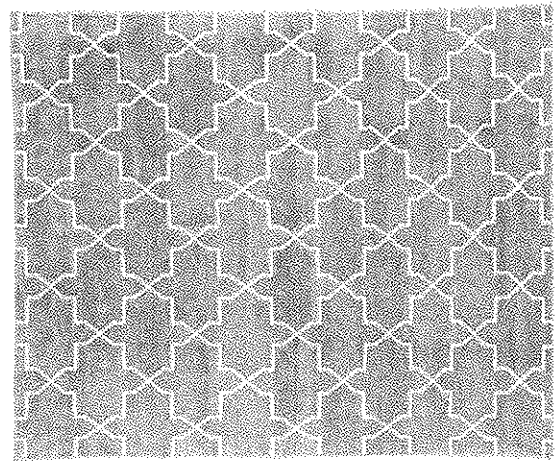
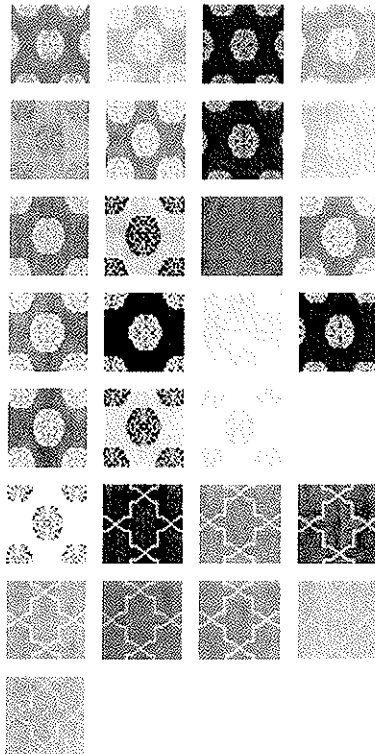
TOLEDO

METALLIC

BERNINI

COTTON PLATWEAVES 1-2-3

COTTON PLATWEAVES 4-5-6



Brooke Avocado Chenille

AVAILABLE IN: 3'5'x5'5' 5'x9' 8'x10' 9'x12' 10'x14' 2'6'x9'

10

← BACK TO MAIN MENU

HOME

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CONTACT

FAQ

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CARPETS

TRAVELER 1-2

TRAVELER 3-10PCS

CLIMBERS & PARBLES

VELVETIN

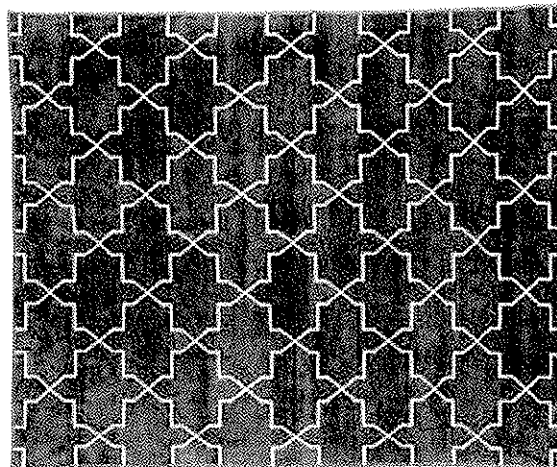
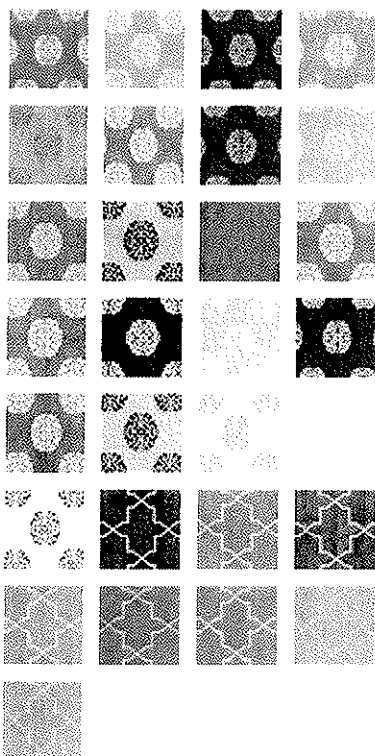
TUBES

METALLICS

BENIMS

COTTON PLATWEAVES 1-2-3

WALLPAPER 1-10-12



Brooke Chestnut Chenille

3'6"x6'6" 6'x9' 8'x10' 9'x12 10'x14' 2'6"x9'

8'x10'

4 BACK TO MAIN MENU

CONTACT

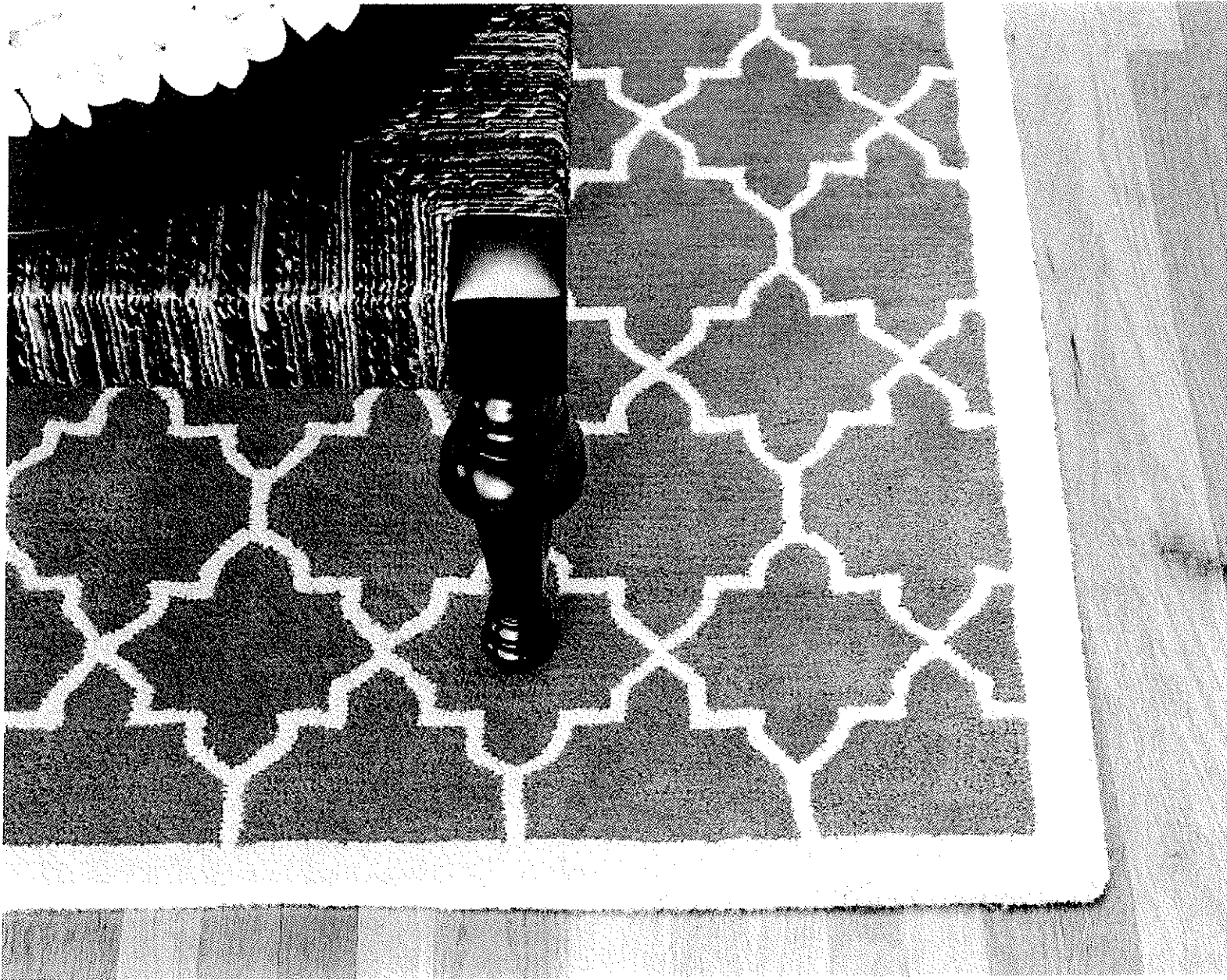
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EXHIBIT D



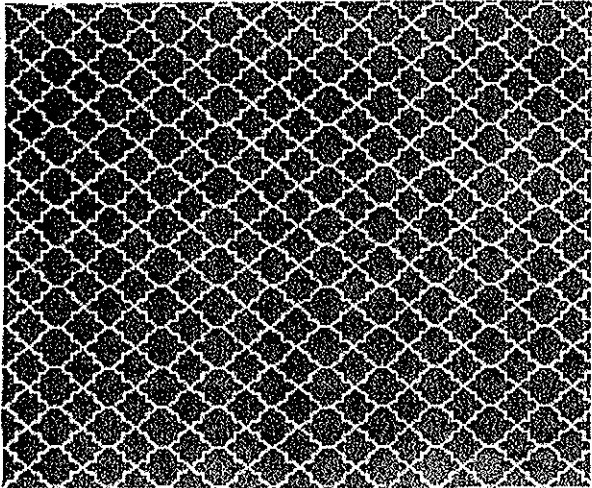


EXHIBIT E

